

Patricia A. Ambrose

Deposition

May 10, 2005

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<p>1 Q. Okay. What else do you remember about the</p> <p>2 wife?</p> <p>3 A. That's about it.</p> <p>4 Q. Do you remember her saying anything else?</p> <p>5 A. I don't recall.</p> <p>6 Q. Okay. And -- and how about Mr. Allen? What</p> <p>7 else do you remember about him?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay. I'm just curious. I don't -- I don't</p> <p>10 want you to make up any memories. I'm just curious if</p> <p>11 you --</p> <p>12 A. I wouldn't make up a memory.</p> <p>13 Q. -- if you do remember anything else. Do you</p> <p>14 remember whether or not he said -- did he -- do you</p> <p>15 remember anything about whether or not he was</p> <p>16 nauseous, whether or not he said he had been vomiting,</p> <p>17 anything like that?</p> <p>18 A. I don't recall.</p> <p>19 Q. Okay. Would you have written down that his</p> <p>20 head was hurting if he hadn't told you that?</p> <p>21 A. If he hadn't told me that?</p> <p>22 Q. Yeah.</p> <p>23 A. Why would I write it down?</p> <p>24 Q. Right. So -- so when you say "ears and head</p> <p>25 are hurting," that would be information that he gave</p>	<p>1 Q. Okay. Well, was he giggling when he was</p> <p>2 there?</p> <p>3 A. No.</p> <p>4 Q. Okay. What -- what was he doing?</p> <p>5 A. Sitting there.</p> <p>6 Q. Okay. And so -- so you -- so you kind of</p> <p>7 determined that you didn't think he had a pain level</p> <p>8 of ten. Is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And what did you think his pain level</p> <p>11 was?</p> <p>12 A. I can't base pain on someone.</p> <p>13 Q. Okay. Well, you triaged this patient to the</p> <p>14 urgent care center. Is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you gave him a triage level of four. Is</p> <p>17 that right?</p> <p>18 A. Yes.</p> <p>19 Q. And why did you do that?</p> <p>20 A. Because he didn't look severe enough to go</p> <p>21 to the other side.</p> <p>22 Q. Okay. And so if he went to the UCC, he was</p> <p>23 going to be seen by either an ANP or a PA. Is that</p> <p>24 correct?</p> <p>25 A. Yes.</p>
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<p>1 you?</p> <p>2 A. Yes.</p> <p>3 Q. And then it also says that he was up all</p> <p>4 night. Is that information that he gave you?</p> <p>5 A. Yes.</p> <p>6 Q. And then P equals ten. Is that the pain</p> <p>7 level?</p> <p>8 A. Yes.</p> <p>9 Q. All right. So -- and then it says "sitting</p> <p>10 with ease." What -- what does that mean?</p> <p>11 A. He was sitting.</p> <p>12 Q. Okay. You wrote down "pain contract."</p> <p>13 Where did you get that information?</p> <p>14 A. From Todd.</p> <p>15 Q. Okay. And what do you remember him saying</p> <p>16 about that?</p> <p>17 A. That he was on a pain contract.</p> <p>18 Q. Anything else?</p> <p>19 A. No.</p> <p>20 Q. Did -- was -- is -- he reports a pain level</p> <p>21 of ten. Did you decide that he didn't have a pain</p> <p>22 level of ten, or did you think he had a pain level of</p> <p>23 ten?</p> <p>24 A. By the way he was sitting, no, he didn't</p> <p>25 look to be in a ten.</p>	<p>1 Q. He wasn't going to be seen by a physician.</p> <p>2 Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. And what is the -- what's the Level 4</p> <p>5 triage, generally? Like what does that mean if</p> <p>6 they're at a Level 4, as opposed to 1, 2, or 3?</p> <p>7 A. That he can be seen on the UCC side.</p> <p>8 Q. What else does it mean, in terms of how long</p> <p>9 they can wait or whether or not they really need</p> <p>10 urgent care?</p> <p>11 A. It doesn't.</p> <p>12 Q. It doesn't?</p> <p>13 A. It means you just put them in the front of</p> <p>14 the rack.</p> <p>15 Q. When we were talking about the five acuity</p> <p>16 levels, it sounded like, you know, patients who are</p> <p>17 one, they got to be seen now; two, almost as soon they</p> <p>18 need to be seen; three, they can wait a little bit;</p> <p>19 four, they can wait. Is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. So in your determination, this is a</p> <p>22 patient -- didn't need to be seen emergently. He</p> <p>23 could just -- he could wait. Is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. Who else was on shift with you that day?</p>

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1 Q. Okay. But did you have some judgment of him
2 on -- on the morning of April 19th after you found out
3 he had a pain contract and you felt like you
4 recognized him?

5 A. No.

6 Q. How often do patients come in to the ER with
7 pain contracts?

8 A. They usually tell us if they're on a pain
9 contract.

10 Q. And Todd Allen, in fact, told you he was on
11 a pain --

12 A. Yes.

13 Q. -- contract. Is that right?

14 A. That's right.

15 Q. Did he ask you for any medication?

16 A. No. They're very honest there.

17 Q. And when you say "they're very honest," what
18 do you mean?

19 A. The patients that are on pain contracts tell
20 us.

21 Q. Okay. Who would have written down the
22 disposition of the case; that is, the discharge, the
23 departure time?

24 A. Susie Edwards.

25 Q. Okay. And how do you know that?

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1 A. Her initials, Susie Edwards.

2 Q. Okay. And is that under the RN?

3 A. Yes.

4 Q. And what -- what -- what role would she
5 play? I mean, what would she do?

6 A. She was the nurse.

7 Q. And so what does that mean?

8 A. She was the nurse when he was put in the
9 room. She was his nurse.

10 Q. Okay. And so what kinds of things would she
11 be doing? Would she be the one giving him the
12 Phenergan shot?

13 A. Yes.

14 Q. Okay. So if he needed any kind of either
15 medication or shot or something, she would be the one
16 doing that. Is that right?

17 A. Yes.

18 Q. Okay. And she's the one that would kind of
19 escort him out or --

20 A. Discharge him.

21 Q. Okay. Can you tell -- do you recognize
22 Susie Edward's signature or -- not signature but
23 writing? Do you -- I guess my question is: Do you
24 know whether or not she's written anywhere else in
25 this form aside from the disposition of case?

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1 A. Right here (indicating).

2 Q. Okay. And "right here" meaning --

3 A. Where she gave the Phenergan.

4 Q. Okay. So there's a -- a note by the
5 Phenergan. And what does that say?

6 A. At 0800 in the right gluteus.

7 Q. Okay. And so that would be her signature as
8 well?

9 A. Yes.

10 Q. All right. So did you have any contact with
11 Mrs. Allen at any other point during that -- that day,
12 April 19th?

13 A. No.

14 Q. Okay. Had you had any -- do you recall
15 having any contact at all with Mrs. Allen at any time
16 while you were working at ANMC, aside from the morning
17 of April 19th?

18 A. No. I believe that's the first time I have
19 seen her.

20 Q. Okay. Do you remember whether or not she
21 was pregnant that morning or --

22 A. I don't recall.

23 Q. When you -- going back to the -- your task
24 as a triage nurse. When you first see the patient in
25 the room by the waiting room, does the patient stay in

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1 that room, or do you take them to a different room if
2 they're going to the UCC?

3 A. They wait out front in the waiting room.

4 Q. Okay. So you see them in the triage room,
5 and then you take them back to the waiting room?

6 A. Tell them to go wait out front, yes.

7 Q. Is that correct? Okay. Do you tell the
8 patient that you're going to send them to the urgent
9 care center as opposed to the emergency department?

10 A. No.

11 Q. Okay. Do you tell them that they're going
12 see a mid-level practitioner as opposed to a
13 physician?

14 A. No.

15 Q. Are they -- is the patient given anything
16 kind of telling them that they're going to go to the
17 UCC versus the ER?

18 A. No.

19 Q. Who gets the patient's chart? Do you do
20 that, or does the clerk?

21 A. Clerk.

22 Q. Do you remember whether or not you had --
23 does -- I mean, does sometimes it happen where they
24 just can't locate the patient's chart?

25 A. Yes.